

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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HELLAL DJERROUD,

Plaintiff,

1:17-CV-00702 (CBA) (CLP)

VERIFIED ANSWER

-against-

909 FULTON GROCERY & DELI CORP., and
ADEL RADJI,

Defendants.
-----X

Defendant, **909 FULTON GROCERY & DELI CORP., and ADEL RADJI**, by its attorneys, HELD & HINES, L.L.P., as and for its Verified Answer herein alleges as follows upon information and belief:

1. Defendants admit the allegations contained in Paragraph 1 of Plaintiff's Verified Complaint. Plaintiff herein denies the sum and substance of the allegations in Paragraph 1 of this Complaint.

2. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 2 of Plaintiff's Verified Complaint. Plaintiff herein denies the sum and substance of the allegations in Paragraph 2 of this Complaint.

3. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 3 of Plaintiff's Verified Complaint.

4. Defendants admit the allegations contained in Paragraph 4 of Plaintiff's Verified Complaint.

5. Defendants admit the allegations contained in Paragraph 5 of Plaintiff's Verified Complaint.

6. Defendants deny the allegations contained in Paragraph 6 of Plaintiff's Verified Complaint.

7. Defendants deny the allegations contained in Paragraph 7 of Plaintiff's Verified Complaint.

8. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 8 of Plaintiff's Verified Complaint.

9. Defendants deny the allegations contained in Paragraph 9 of Plaintiff's Verified Complaint.

10. Defendants deny the allegations contained in Paragraph 10 of Plaintiff's Verified Complaint.

11. Defendants deny the allegations contained in Paragraph 11 of Plaintiff's Verified Complaint.

12. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 12 of Plaintiff's Verified Complaint.

13. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 13 of Plaintiff's Verified Complaint.

14. Defendants admit the allegations contained in Paragraph 14 of Plaintiff's Verified Complaint.

15. Defendants deny the allegations contained in Paragraph 15 of Plaintiff's Verified Complaint.

16. Defendants deny the allegations contained in Paragraph 16 of Plaintiff's Verified Complaint.

17. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 17 of Plaintiff's Verified Complaint.

18. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 18 of Plaintiff's Verified.

19. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 19 of Plaintiff's Verified Complaint.

20. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 20 of Plaintiff's Verified Complaint.

21. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 21 of Plaintiff's Verified Complaint.

22. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 22 of Plaintiff's Verified Complaint.

23. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 23 of Plaintiff's Verified Complaint.

24. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 24 of Plaintiff's Verified Complaint.

25. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 25 of Plaintiff's Verified Complaint.

26. Defendants deny the allegations contained in Paragraph 26 of Plaintiff's Verified Complaint.

27. Defendants deny the allegations contained in Paragraph 27 of Plaintiff's Verified Complaint.

28. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 28 of Plaintiff's Verified Complaint.

29. Defendants deny the allegations contained in Paragraph 29 of Plaintiff's Verified Complaint.

30. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 30 of Plaintiff's Verified Complaint.

31. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 31 of Plaintiff's Verified Complaint.

32. Defendants deny the allegations contained in Paragraph 32 of Plaintiff's Verified Complaint.

33. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 33 of Plaintiff's Verified Complaint.

34. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 34 of Plaintiff's Verified Complaint.

35. Defendants deny the allegations contained in Paragraph 35 of Plaintiff's Verified Complaint.

36. Defendants deny the allegations contained in Paragraph 36 of Plaintiff's Verified Complaint.

37. Defendants deny the allegations contained in Paragraph 37 of Plaintiff's Verified Complaint.

38. Defendants deny the allegations contained in Paragraph 38 of Plaintiff's Verified Complaint.

39. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 39 of Plaintiff's Verified Complaint.

40. Defendants deny the allegations contained in Paragraph 40 of Plaintiff's Verified Complaint.

41. Defendants deny the allegations contained in Paragraph 41 of Plaintiff's Verified Complaint.

42. Defendants deny the allegations contained in Paragraph 42 of Plaintiff's Verified Complaint.

43. Defendants deny the allegations contained in Paragraph 43 of Plaintiff's Verified Complaint.

44. Defendants deny the allegations contained in Paragraph 44 of Plaintiff's Verified Complaint.

45. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 45 of Plaintiff's Verified Complaint.

46. Defendants deny the allegations contained in Paragraph 46 of Plaintiff's Verified Complaint.

47. Defendants deny the allegations contained in Paragraph 47 of Plaintiff's Verified Complaint.

48. Defendants deny the allegations contained in Paragraph 48 of Plaintiff's Verified Complaint.

49. Defendants deny the allegations contained in Paragraph 49 of Plaintiff's Verified Complaint.

50. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 50 of Plaintiff's Verified Complaint.

51. Defendants deny the allegations contained in Paragraph 51 of Plaintiff's Verified Complaint.

52. Defendants deny the allegations contained in Paragraph 52 of Plaintiff's Verified Complaint.

53. Defendants deny the allegations contained in Paragraph 53 of Plaintiff's Verified Complaint.

54. Defendants deny the allegations contained in Paragraph 54 of Plaintiff's Verified Complaint.

55. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 55 of Plaintiff's Verified Complaint.

56. Defendants deny the allegations contained in Paragraph 56 of Plaintiff's Verified Complaint.

57. Defendants deny the allegations contained in Paragraph 57 of Plaintiff's Verified Complaint.

58. Defendants deny the allegations contained in Paragraph 58 of Plaintiff's Verified Complaint.

59. Defendants deny the allegations contained in Paragraph 59 of Plaintiff's Verified Complaint.

60. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 60 of Plaintiff's Verified Complaint.

61. Defendants deny the allegations contained in Paragraph 61 of Plaintiff's Verified Complaint.

62. Defendants deny the allegations contained in Paragraph 62 of Plaintiff's Verified Complaint.

63. Defendants deny the allegations contained in Paragraph 63 of Plaintiff's Verified Complaint.

64. Defendants deny the allegations contained in Paragraph 64 of Plaintiff's Verified Complaint.

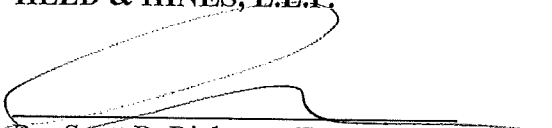
First Affirmative Defense

Defendants reserve their rights to assert affirmative defense(s) based on information gathered in the course of additional investigation and discovery.

Dated: New York, New York
June 16, 2017

Yours, etc.,

HELD & HINES, L.L.P.



By: Scott B. Richman, Esq.
Attorneys for Defendants
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VERIFICATION

STATE OF NEW YORK)
) ss:
COUNTY OF NEW YORK)

Adel Ali, being duly sworn deposes and says:

That deponent is the plaintiff in the within action; that deponent has read the foregoing **VERIFIED ANSWER** and knows the contents thereof, that same is true to deponent's own knowledge, except as to the matters therein stated to be alleged upon information and belief, and that as to those matters deponent believes to be true.

adel Ali / Adel Ali

Adel "Radji" individually, and as Agent for 909
Fulton Grocery & Deli Corp.

Sworn before me this 19
day of June, 2017



NOTARY PUBLIC

GLORIA FONTE
Notary Public, State of New York
No. 01FC6192290
Qualified in Kings County
Commission expires August 25, 2020